

DIRECT TESTIMONY

OF

BUD GREEN

SAFETY AND RELIABILITY DIVISION

ILLINOIS COMMERCE COMMISSION

NG-911, Inc.

Application for a Certification of Authority to Operate as a 9-1-1 System Provider
in the State of Illinois

and

Application for a Certificate of Local, Interexchange Authority to Operate as a
Reseller and/or Facilities Based Carrier of Telecommunications Services in all
Areas in the State of Illinois

Docket Nos. 12-0093/0109 Consol.

June 13, 2012

1 **Q. Please state your name and business address.**

2 A. My name is H.K. (Bud) Green and my business address is 527 East Capitol
3 Avenue, Springfield, Illinois, 62701.

4
5 **Q. By whom are you employed and in what capacity?**

6 A. I am employed by the Illinois Commerce Commission as the Chief
7 Telecommunications Engineer in the Safety and Reliability Division.

8
9 **Q. Please describe your professional background.**

10 A. I am a Registered Professional Engineer, licensed in the State of Illinois –
11 License No. 06035130. The license is by examination, current and valid through
12 11/30/2013. I graduated from the University of Illinois at Urbana-Champaign with
13 a Bachelor of Science Degree in Engineering in 1970. After graduation, I joined
14 Illinois Bell Telephone Company as an Engineer in its Engineering Department.
15 While with Illinois Bell for 14 years I held the following positions: Engineer,
16 Systems Analyst, Network Forecasting Engineer, Communications Systems
17 Representative, Account Executive, and Account Manager. At divestiture in
18 1984, I transferred to AT&T as an Account Manager. In 1987, I joined Tele-Sav
19 Inc., an interexchange carrier and held the following positions: IXC Traffic Trader,
20 District Sales Manager, and Director of Strategic Planning. As Director of
21 Strategic Planning I was responsible for the overall intermediate to long range
22 planning for the IXC. When Tele-Sav was sold to Telecom USA (July 1989), I
23 returned to AT&T. Subsequent to the return to AT&T, I held the positions of Data

Networking Account Executive, Sales Manager and Building Engineer. I took an early retirement form AT&T (July 1998) and became the Vice President of a consulting engineering firm, KM2 Design Group P.C. (1998 through June 2000). I joined the Illinois Commerce Commission on June 19th, 2000, as the Chief Telecommunications Engineer.

Q. What is the purpose of your testimony in this proceeding?

A. The purpose of my testimony in this proceeding is to provide testimony as to the technical expertise and capabilities of NG-911, Inc. ("NG-911") as related to their 9-1-1 system provider Application/Petition, their competitive local exchange carrier Application, and their competitive interexchange carrier Application.

Q. What information did you review to determine the technical abilities of NG-911?

A. I reviewed the information in NG-911's Application/Petition, pre-filed testimonies, and issued data requests regarding the technical capabilities of NG-911 relating to the design, implementation, reliability, maintenance, and recovery of a 9-1-1 network.

Q. Do you believe that NG-911 possesses sufficient technical expertise and abilities to receive a Certificate of 9-1-1 System Provider Authority to provide network services and data base services in a safe, continuous, and

uninterrupted manner as required by Section 13-900(c) of the Public Utilities Act?

A. Yes. NG-911's management team has extensive experience in the emergency communications industry. The president, Mr. Ramsey, has listed a fairly extensive technical telecommunications background as noted in Exhibit 7 to NG-911's Petition. (Petition, Exhibit 7) Exhibit 13 to NG-911's Petition consists of over 20 pages of fairly detailed description of the facilities of and technical resources and Exhibit 12 details that NG-911 is capable of developing a recovery and restoration plan for 9-1-1 services. The information contained in Exhibit 13 is particularly important when considering the certification of a new non-legacy company as an entrant as a 9-1-1 System Provider. Exhibit 13 demonstrates that NG-911 has the knowledge and is technically capable of developing a workable plan for 911 services. (Petition, Exhibit 12; Exhibit 13)

Q. What are the specific components of Exhibit 12 that assisted you in determining that NG-911 is technically competent?

A. NG-911 demonstrated in Exhibit 12 that it has the capability of designing Recovery and Restoration procedures for the following:

- Fiber Outages
- Switch Outages
- LEC Service/Interconnection Outages
- AC Power Outages
- 911 Outages

69

70 **Q. What are the specific components of Exhibit 13**
71 **that assisted you in determining that NG911 is technically competent ?**

72 A. NG-911 has demonstrated in Exhibit 13 that it has the capability of designing
73 technical plans that include the following:

74 Local Exchange Integration Co-Location

75 End Office Interconnection

76 Network Architecture

77 Backup Plan

78 Split Exchanges

79 Transition From An Existing Architecture

80

81 **Q. Did NG-911 request any other waivers from 9-1-1 rules or regulations not**
82 **addressed by the testimony of Staff witness Stacy Ross in ICC Staff Exhibit**
83 **1.0?**

84 A. Yes.

85

86 **Q. From which other rules or regulations is NG-911 requesting waivers from in**
87 **its 9-1-1 System Provider Petition?**

88 A. It is requesting waivers from the following 83 Illinois Adm. Code Parts:

89 Code Part 210 –Annual Reports

90 Code Part 215-Designation of Agent

91 Code Part 255 – Notice Requirements for Change in Rates

Code Part 265 – Protection of Underground Utility Facilities

Code Part 270 – Annual Gross Revenue Return Tax

Code Part 726 – Requirements for Businesses with PBX Service to comply with
the Emergency Telephone System Act

Code Part 727 – Requirements for Non-Business Entities with PBX Service to
comply with the Emergency Telephone System Act.

Code Part 728 – Standards of Service Applicable to Wireless 9-1-1 Emergency
Systems

Code Part 730 – Standards of Service for Local Exchange Telecommunications
Carriers.

(Petition, II, E.)

Q. Do you believe that these waivers should be granted in this proceeding?

A. No, I do not. Even though NG-911 is proposing the use of new technologies that
differ from the traditional methods used currently by legacy systems, the granting
of a 9-1-1 System Provider Certificate is not technologically specific. NG 911
would be authorized to provide 9-1-1 services utilizing traditional technology or a
new technology.

**Q. From which other rules or regulations is NG-911 as a CLEC requesting
waivers?**

A. In its CLEC Application, NG-911 is requesting waivers from the following 83
Illinois Adm. Code Parts and Sections:

115 Code Part 710 – Uniform System of Accounts
116 Code Part 735, Section 735.180 – Directories
117 Code Part 250 – Public Utility Books and Accounts
118 (Application, V., pp. 10-12)
119

120 **Q. Do you believe that these waivers should be granted in this proceeding?**

121 A. Yes. These waivers are commonly granted to CLECs and are not inappropriate.
122

123 **Q. If NG-911 is granted a Certificate of 9-1-1 System Provider Authority, will**
124 **NG-911's capabilities be reviewed again?**

125 A. Yes, even though NG-911 would be authorized to operate as a 9-1-1 System
126 Provider in Illinois if the Commission approves its Application, the ICC Staff
127 review applications for technical expertise and design when a 9-1-1 system is
128 new or modified.
129

130 **Q. In your opinion, does NG-911 possess the technical expertise and**
131 **capabilities needed to obtain a 9-1-1 System Provider Certificate, a**
132 **competitive local exchange carrier certificate, and a competitive**
133 **interexchange carrier certificate?**

134 A. Yes. It is my opinion that NG-911 has the technical expertise needed to qualify
135 for certificates of authority to operate as a 9-1-1 system provider, a competitive
136 local exchange, and a competitive interexchange carrier in Illinois. However, as
137 stated above, NG-911 should not be granted waivers of 83 Illinois Adm. Code

138 Parts 210, 215, 255, 265, 270, 726, 727,728, 730; Sections 730.305, 730.325,
139 730.330, 730.520 and 730.600.

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141 **Q. Does this conclude your testimony?**

142 A. Yes.

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